

FIG. 1

- from Adelphi University.
- 3. Ms. Kunik taught in Brooklyn, New York until her constructive discharge in the fall of
- 2014, despite her exemplary job performance which included positive ratings until the acts complained of.
- Beginning in the 2012-2013 school year, Defendants initiated a campaign of harassment and discrimination based upon Plaintiff's age and religion.
- 5. Beginning in the 2012-2013 school year, Principal Kaye Houlihan was Plaintiff's principal and Assistant Principal Dorish Munoz Fuentes was her assistant principal in the Department of Foreign Languages and English as a Second Language ("ESL"). Houlihan and Fuentes spearheaded a campaign against Plaintiff on the grounds of age discrimination and religious discrimination in order to cause her to leave her employment.
- 6. As more fully set forth below: in (1) treating Plaintiff differently than her similarly situated non-Jewish and/or younger co-workers; (2) subjecting Plaintiff to heightened scrutiny on the basis of her age and her religion; (3) subjecting Plaintiff to a hostile work environment on the basis of her age and her religion; (4) subjecting Plaintiff on the basis of her age and her religion to unfair and disproportionate disciplinary actions —an Unsatisfactory rating and a Developing rating; (5) reassigning Plaintiff to a classroom too far to get to in a timely fashion between periods;(6)refusing to hear or respond to Plaintiff's legitimate explanations in her effort to resolve the conflict created by the administration;(7) confusing and belittlingPlaintiff in the presence of colleagues and students; (8) changing Plaintiff's ratings for Observation #3 in 2014, which was found